



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165  
TTY: 1-800-270-1349  
www.tn.gov/humanservices

**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

November 18, 2020

Johnny Cannon, Chairman of the Board  
Our Daily Bread of Tennessee, Incorporated  
900 East Hill Avenue  
Knoxville, Tennessee 37915-2563

Dear Mr. Cannon,

The Department of Human Services (DHS) - Division of Audit Services staff conducted a limited desk review that included a limited number of unannounced on-site monitoring review of the Child and Adult Care Food Program (CACFP) at Our Daily Bread of Tennessee, Inc. (Sponsor), Application Agreement number 00-059, beginning on April 27, 2020. Additional information was requested and provided on July 30, 2020 and provided on July 31, 2020, requested and provided on September 24, 2020, and additional documents were provided on October 26, 2020. Our scope of the review was for reimbursement made to the Sponsor for March 2020.

Based on our review of the Sponsor's records and information provided, the Sponsor had 257 active centers and 242 active homes for a total of 499 sites operating during the review period. We used a randomizer to select sample sites as follows:

The **Academia Preschool**, Aunty K's Child Care (**Aunty K's**), Bearly Tots Enrichment Center Inc. (**Bearly Tots**), Breath of Life Preparatory Preschool (**Breath of Life**), Brookside Learning Center LLC (**Brookside**), Country Home Day Care (**Country Home**), **Cradles to Crayons**, Creative Scholars Inc. Academy (**Creative Scholars**), **Crossroads Academy**, **Discovery Learning Academy**, Growing Minds Learning House (**Growing Minds**), Horn Lake Road Day Care Center Inc. (**Horn Lake**), **Jaymes Academy #1**, Jungle Town Daycare & Early Learning Center (**Jungle Town**), **Kiddie Kingdom**, Kinder Academy Learning Center II, LLC (**Kinder Academy II**), Lily Pad Learning Center II (**Lily Pad II**), **Little Tikes**, Littlebug's Learning Leaf (**Littlebug**), Meg Meg's Learn and Play Center, LLC (**Meg Meg**), Presbyterian Day School (**Presbyterian**), Red Rover Preschool (**Red Rover**), Sweet Pea's (**Sweet Pea**), Tate's Totz N Teenz Child Development (**Tate**), and The Village Learning Academy (**The Village**) child care centers were selected as part of the sample. Additionally, **MTSU Child Care Lab** and **The Growing Patch Learning Academy #2** were randomly selected as sample sites, but the Sponsor did not claim for these sites; therefore, they were not included in this report. Additionally, there were complaints filed against **Discovery Learning Academy**, **Sweet Pea**, and **Tate**; therefore, these centers were reported on separately to report the results of the review

regarding the complaints filed.

The homes of **Aundrea Allen, Maggie Brashers, Marla Breedlove, Melinda Brown, Brandi Cheatham, Laquita Dandridge, Cybil Dorsey, Timolin Glenn, Chasyti Goodwin, Tracy Herman, Carolyn Holloway, Becky Holmes, Kimberly Holmes, Kimberly Hurst, Candus Johnson, Chasity Lopez, Alice Perkey, Clarice Ross, Barbara Starks, Joy Wells, Karen Williams, and Jessica Young** were selected as part of the sample. Additionally, the home of **Deloris Benton** was randomly selected as a sample site, but the Sponsor did not claim for this site; therefore, the site was not included in this report.

Due to the outbreak and the risk that COVID19 poses to the Sponsor and our staff, the review was limited to verification, based on review of the documents obtained from Sponsor, via e-mail, mail, or other electronic transmission of documents. We also, obtained confirmation from the feeding sites and Sponsor staff via telephone or e-mail relative to the operation and administration of the CACFP. Prior to the COVID 19 outbreak, we observed meal services at the following child care centers: **Aunty K's, Country Home, Cradles to Crayons, Crossroads Academy, Horn Lake, Jaymes Academy #1, Lily Pad II, Littlebug, Presbyterian, and Red Rover** and the following day care home providers: **Aundrea Allen, Timolin Glenn, Kimberly Hurst, Candus Johnson, Clarice Ross, Barbara Starks, and Jessica Young.**

The purpose of this review was to determine if the Sponsor complied with USDA regulations set through the COVID-19 period, taking into consideration the waivers granted to the Sponsor's operation. Also, to determine if the Sponsor complied with the applicable *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreements, and applicable Federal and State regulations.

### Background

CACFP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement meals served. Meals served by participating Sponsors must meet the minimum guidelines set by the United States Department of Agriculture (USDA) and DHS to be eligible for reimbursement. The CACFP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) to seek reimbursement.

We inspected meal counts sheets for March 2020 and reconciled the meals claimed to the meals reported as served for each meal service. We also assessed compliance with civil rights requirements.

**Important COVID-19 note:** Due the current outbreak and the risk that COVID19 poses to your organization personnel and our staff, all our staff are working from home with no or very limited access to the office. Therefore, we will not send a copy of this report via regular mail until further notice. Please confirm the receipt of this email as it is currently the option to communicate to you. If you need any assistance or have any questions, please do not hesitate to contact us via email.

Our review of records for March 2020 disclosed the following:

#### **1. The Sponsor reported the number of meals claimed for reimbursement incorrectly**

### Condition

#### **Unaffiliated Centers:**

## **Jungle Town – sample center**

Based on our review of the Claim for Reimbursement for the March 2020 for **Jungle Town**, the Sponsor claimed 819 breakfast meals, 916 lunch meals, and 847 supplements. However, based on our review of available documents, we noted that there were 798 breakfast meals, 917 lunch meals, and 850 supplements served, prior to any meal disallowances.

As a result, 21 breakfast meals were overreported and one (1) lunch meal and three (3) supplements were underreported. (See Exhibit N)

### **Daycare Home Providers:**

#### **Barbara Starks – sample center**

Based on our review of the Claim for Reimbursement for March 2020 for **Barbara Starks**, the Sponsor claimed 312 breakfast meals, 361 lunch meals, 144 supper meals, and 417 supplements. However, based on our review of available documents, we noted that there were 333 breakfast meals, 361 lunch meals, 144 supper meals, and 501 supplements served, prior to any meal disallowances.

As a result, 21 breakfast meals and 84 supplements were underreported. (See Exhibit AQ)

***This is a repeat finding from a previous report dated July 1, 2019.***

#### **Criteria**

*Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "... In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim...."*

#### **Recommendation**

The Sponsor should ensure that claims for reimbursement are completed correctly and based on accurate supporting documents.

## **2. The Sponsor reported the number of meals served for observed meals incorrectly**

#### **Condition**

During our monitoring visits completed during the review period, we observed meal services. We completed the Sponsor review via Skype on April 27, 2020, during the virtual conference, we requested meal count documentation for the sample centers. Based on our review of the meal counts provided, the following centers reported incorrect meal counts based on the number of meals observed during our on-site monitoring visits:

Center	Date	Meal Observed	No. Observed	No. Claimed	Difference	Exhibit
Aunty K's	3/9/20	Lunch	56	54	+2	C
Cradles to Crayons	3/9/20	Lunch	17	20	-3	H
Crossroads Academy	3/9/20	Lunch	77	76	+1	J
Jaymes Academy #1	3/9/20	Breakfast	49	62	-13	M
Lily Pad II	3/6/20	Breakfast	8	9	-1	Q

Littlebug	3/10/20	Lunch	84	75	+9	S
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As a result, there were 14 breakfast meals overreported and nine (9) lunch meals underreported. (See Exhibits)

Criteria

*Title 7 of the Code of Federal Regulations, Section 226.10(c)* states, "... In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim...."

Recommendation

The Sponsor should ensure that meal count forms are completed correctly and accurately.

**3. The Sponsored centers and homes served not creditable meals that observed during the on-site visits**

Condition

During our on-site monitoring visit at **Aunty K's** on March 9, 2020, we observed a lunch meal service. There were five (5) participants served water instead of milk. There were no medical statements on file for the participants stating that water should be served instead of milk.

As a result, five (5) lunch meals were disallowed. (See Exhibit C)

During our on-site monitoring visit at **Jaymes Academy #1** on March 9, 2020, we observed a breakfast meal service. There was one (1) one-year old participant served chocolate milk.

As a result, one (1) breakfast meal was disallowed. (See Exhibit M)

During our on-site monitoring visit at the home of **Barbara Starks** on March 3, 2020, we observed a breakfast meal service. There were seven (7) participants served cereal and milk. There was no vegetable or fruit component served.

As a result, seven (7) breakfast meals were disallowed. (See Exhibit AQ)

***This is a repeat finding from a previous report dated July 1, 2019.***

Criteria

*Title 7 of the Code of Federal Regulations, Section 226.17(b)(4)* states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20..."

*Title 7 of the Code of Federal Regulations, Section 226.18(d)* states, "Each day care home participating in the program shall serve the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20. Menu records shall be maintained to document compliance with these requirements. Meals shall be served at no separate charge to enrolled children."

*Title 7 of the Code of Federal Regulations, Section 226.20(a)(1)* states, "Fluid milk must be

served as a beverage or on cereal, or a combination of both, as follows: (i) Children one year of age must be served unflavored whole milk. (ii) Children two through five years old must be served either unflavored low-fat (1 percent) or unflavored fat-free (skim) milk....”

*Title 7 of the Code of Federal Regulations, Section 226.20(c)(1)* states, in part, “Fluid milk, vegetables or fruit, or portions of both, and grains are required components of the breakfast meal.”

*Title 7 of the Code of Federal Regulations, Section 226.20(c)(2)* states, “Fluid milk, meat and meat alternatives, vegetable, fruits, and grains are required components in the lunch and supper meals.”

The USDA policy memorandum, CACFP 14-2017 Modifications to Accommodate Disabilities in the Child and Adult Care Food Program outlines the requirements for CACFP sponsors to provide reasonable modifications to Program meals or the meal service to accommodate children or adults (participants) with disabilities.

#### Recommendation

The Sponsor should ensure that meals served meet the USDA meal pattern requirements.

#### **4. The Sponsored daycare home provider did not have required documents or information available during the on-site visits**

##### Condition

During our on-site visit to the home of **Barbara Starks (feeding site)** on March 2, 2020, the feeding site staff did not provide us with the attendance and meal count records. The Sponsor, however, subsequently provided the requested meal count records for March 3, 2020.

Based on the records provided by the Sponsor and the number of meals reported for the observed meal, we noted the number of meals claimed for reimbursement were correct. Therefore, no meals were disallowed. (See Exhibit AQ)

Additionally, there were daycare home providers that did not have enrollment information on file for participants:

- During our monitoring visit on March 12, 2020, at the home of **Candus Johnson**, enrollment information was not on file for three (3) participants.
- During our monitoring visit on March 12, 2020, at the home of **Timolin Glenn**, enrollment information was not on file for one (1) participant.

The Sponsor, however, was able to provide documentation supporting enrollment of the participants for both daycare home providers. As a result, no meals were disallowed.

##### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.18(e)* states, “Each day care home must maintain on file documentation of each child's enrollment and must maintain daily records of the number of children in attendance and the number of meals, by type, served to enrolled

children....”

*Title 7 of the Code of Federal Regulations, Section 226.18(g)* states, “Each day care home shall comply with the recordkeeping requirements established in §226.10(d) and in this section. Failure to maintain such records shall be grounds for the denial of reimbursement.”

Recommendation

The Sponsor should ensure that day care home providers record and maintain all required documents for three years.

**5. The Sponsor did not provide documentation to support sufficient quantities of milk were purchased for all meals reported**

Condition

Based on the number of meals served with milk as a component, the Sponsor was required to purchase a total number of ounces of milk that were not supported by inventories and receipts for provided for the sponsored centers. The noted amount of milk for centers that resulted in shortages were as follows:

Center	Required Ounces	Available Ounces	Ounces Short	Meal Type	No. Disallowed	Exhibit
Academia Preschool	1,208	768	440	Breakfast	3	B
				Snack	95	
Aunty K's	5,380	3,968	1,412	Breakfast	230	C
Bearly Tots	3,278	2,816	462	Breakfast	77	D
Breath of Life	9,236	8,848	388	Breakfast	50	E
Country Home	15,132	9,472	5,660	Breakfast	936	G
Cradles to Crayons	4,622	3,071	1,550	Breakfast	145	H
				Snack	169	
Creative Scholars	4,816	2,048	2,768	Breakfast	481	I
				Lunch	3	
Crossroads Academy	10,866	10,240	626	Breakfast	104	J
Growing Minds	3,526	3,456	70	Breakfast	12	K
Horn Lake	8,572	7,552	1,020	Breakfast	128	L
Jungle Town	9,016	8,064	952	Breakfast	118	N
				Snack	43	
Lily Pad II	1,680	1,152	528	Breakfast	76	Q
				Snack	6	
Little Tikes	7,814	4,096	3,718	Breakfast	695	R
Littlebug	11,720	2,816	8,904	Breakfast	963	S
				Lunch	604	
Meg Meg	7,922	2,688	5,234	Breakfast	758	T
				Lunch	209	
Presbyterian	10,024	6,336	3,688	Breakfast	543	U
Red Rover	6,700	640	6,060	Breakfast	489	V
				Lunch	388	
				Snack	199	
The Village	4,556	1,984	2,572	Breakfast	390	W

				Lunch	94	
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As a result, 6,199 breakfast meals, 1,298 lunch meals, and 512 supplements were disallowed. (See Exhibits)

***This is a repeat finding from a previous report dated July 1, 2019.***

Criteria

*Title 7 of the Code of Federal Regulations, Section 226.17(b)(4)* states, “Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20....”

*Title 7 of the Code of Federal Regulations, Section 226.20 (c)(1)* states, in part, “Fluid milk, vegetables or fruit, or portions of both, and grains are required components of the breakfast meal.”

*Title 7 of the Code of Federal Regulations, Section 226.20(c)(2)* states, “Fluid milk, meat and meat alternatives, vegetable, fruits, and grains are required components in the lunch and supper meals.”

*Title 7 of the Code of Federal Regulations, Section 226.20(c)(3)* states, “Serve two of the following five components: Fluid milk, meat and meat alternates, vegetables, fruits, and grains. Fruit juice, vegetable juice, and milk may comprise only one component of the snack. ...”

*Title 7 of the Code of Federal Regulations, Section 226.20(a)(1)* states, “Fluid milk must be served as a beverage or on cereal, or a combination of both, as follows: Children one year of age must be served unflavored whole milk. Children two through five years old must be served either unflavored low-fat (1 percent) or unflavored fat-free (skim) milk. Children six years old and older must be served milk that is low-fat (1 percent fat or less) or fat-free (skim). Milk may be unflavored or flavored from July 1, 2018, through June 30, 2019 (school year 2018-2019).”

*Title 7 of the Code of Federal Regulations, Section 226.20(e)(1)* states, “When emergency conditions prevent an institution or facility normally having a supply of milk from temporarily obtaining milk deliveries, the State agency may approve the service of breakfast, lunches, or suppers without milk during the emergency period.”

*Title 7 of the Code of Federal Regulations, Section 225.16(f)(6)* Temporary unavailability of milk. If emergency conditions prevent a sponsor normally having a supply of milk from temporarily obtaining milk deliveries, the State agency may approve the service of breakfasts, lunches or suppers without milk during the emergency period.

Recommendation

The Sponsor should perform a month-end inventory for milk and maintain all receipts for food purchases to verify the required amount of milk was purchased and served.

**6. The Sponsored childcare centers had parent or guardian statements or medical statements on file for participants with special dietary needs that did not meet the requirements**

Condition

We requested statements from a parent or guardian and/or medical statements for any participants enrolled at the sponsored centers and homes that received meal substitutions due to special dietary needs or disabilities. The Sponsor stated that participants marked as having special dietary needs on the meal count forms provided did not necessarily result in a meal substitution being provided but was to bring attention that a substitution may have been requested one point. Therefore, we only concluded on meals served to participants where a statement was provided, and the statement(s) did not meet the USDA requirements, or the Sponsor stated no statement was available due to the participant no longer enrolled.

The results of our review are as follows:

- There was one (1) participant enrolled at **Aunty K's** during the review period substitutions for special dietary needs that had a parent statement on file. However, the statement indicated that almond milk was to be served. Almond milk is not a creditable substitution for cow's milk.
- There was one (1) participant enrolled at **Jungle Town** during the review period substitutions for special dietary needs that had a doctor's statement on file, but the statement did not specify the substitution to be made.
- There were two (2) participants enrolled at **Littlebug** during the review period that received substitutions for special dietary needs that did not have a statement on file. The Sponsor stated the participants were no longer enrolled and statements were not kept on file.
- There was one (1) participant enrolled at **The Village** during the review period substitutions for special dietary needs that had a doctor's statement on file, but the statement did not specify the substitution to be made.

Technical assistance was provided regarding this finding and no meals were disallowed.

### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.20(g)(1)* states, "Exceptions for disability reasons. Reasonable substitutions must be made on a case-by-case basis for foods and meals described in paragraphs (a), (b), and (c) of this section for individual participants who are considered to have a disability under 7 CFR 15b.3 and whose disability restricts their diet. (i) A written statement must support the need for the substitution. The statement must include recommended alternate foods, unless otherwise exempted by FNS, and must be signed by a licensed physician or licensed health care professional who is authorized by State law to write medical prescriptions. (ii) A parent, guardian, adult participant, or a person on behalf of an adult participant may supply one or more components of the reimbursable meal as long as the institution or facility provides at least one required meal component."

*Title 7 of the Code of Federal Regulations, Section 226.20(g)(2)* states, "Exceptions for non-disability reasons. Substitutions may be made on a case-by-case basis for foods and meals described in paragraphs (a), (b), and (c) of this section for individual participants without disabilities who cannot consume the regular meal because of medical or special dietary needs. (i) A written statement must support the need for the substitution. The statement must include recommended alternate foods, unless otherwise exempted by FNS. Except for substitutions of fluid milk, as set forth below, the statement must be signed by a recognized medical authority."



(ii) A parent, guardian, adult participant, or a person on behalf of an adult participant may supply one component of the reimbursable meal as long as the component meets the requirements described in paragraphs (a), (b), and (c) of this section and the institution or facility provides the remaining components.”

*Title 7 of the Code of Federal Regulations, Section 226.20(g)(3)* states, “Fluid milk substitutions for non-disability reasons. Non-dairy fluid milk substitutions that provide the nutrients listed in the following table and are fortified in accordance with fortification guidelines issued by the Food and Drug Administration may be provided for non-disabled children and adults who cannot consume fluid milk due to medical or special dietary needs when requested in writing by the child’s parent or guardian, or by, or on behalf of, an adult participant. An institution or facility need only offer the non-dairy beverage that it has identified as an allowable fluid milk substitute according to the following table.

Nutrient	Per cup (8 fl oz)
Calcium	276 mg.
Protein	8 g.
Vitamin A	500 IU.
Vitamin D	100 IU.
Magnesium	24 mg.
Phosphorus	222 mg.
Potassium	349 mg.
Riboflavin	0.44 mg.
Vitamin B-12	1.1 mcg.

The USDA policy memorandum, CACFP 14-2017 Modifications to Accommodate Disabilities in the Child and Adult Care Food Program outlines the requirements for CACFP sponsors to provide reasonable modifications to Program meals or the meal service to accommodate children or adults (participants) with disabilities

The USDA Independent Child Care Centers – A CACFP Handbook, page 36, states, If the institution serves children that have disabilities or special dietary needs that lead to alterations of the meal pattern or the menu, ensure that these children are being served meals in accordance with their needs and confirm that the appropriate documentation has been obtained and retained to support claiming the meals. See Part 11, Attachment 1 for a prototype form for documenting a medical or special dietary needs substitution.

- Medical Statements – In order to claim a meal that does not conform to the regulatory meal pattern, there must be a medical reason or a special dietary need and a signed statement on file.
- Disabilities - If an institution is serving a child with a disability and that disability directly affects which foods the child can consume, the parent and/or guardian must submit a medical statement signed by a licensed physician. The medical statement must be kept on file, handled confidentially, and must describe:

- o The child's disability and an explanation of why the disability restricts the child's diet;
  - o The major life activity affected by the disability;
  - o The food or foods to be omitted from the child's diet, and
  - o The appropriate substitutions.
- Special Dietary Needs - If an institution is serving a child with special dietary needs (e.g., vegetarian), the parent/guardian may request substitutions by submitting a medical statement signed by a recognized medical authority, such as physician, physician assistant, nurse practitioner or other professional specified by the State agency, listing the foods to be omitted and appropriate substitutions.

Note: Milk substitutions that are made due to special dietary needs that are not a disability must be nutritionally equivalent to milk, even if accompanied by a medical statement. The institution can make such substitutions at its discretion.”

#### Recommendation

The Sponsor should ensure that parent or guardian statements and/or medical statements are kept on file for participants with special dietary needs or disabilities and that proper meal substitutions are provided for meals claimed.

### **7. Sponsored center served meals outside of the approved serving time**

#### Condition

During our on-site monitoring visit at **Country Home Day Care** on March 12, 2020 to observe a supplement service, we noted that the supplement was served outside of the TIPS approved time. We arrived at 2:00 pm to observe the supplement service with an approved meal service time in TIPS for 2:30 pm to 3:00 pm. The assistant director on-site informed us that the supplement had already been served prior to our arrival. Since supplement was served prior to the monitor's arrival, we could not determine if the supplement served was creditable.

As a result, 55 supplements claimed were disallowed. (See Exhibit G)

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.17(b)(4)* states, “Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20....”

*Title 7 of the Code of Federal Regulations, Section 226.17(b)(9)* states, “Each child care center must maintain daily records of time of service meal counts by type (breakfast, lunch, supper, and snacks) served to enrolled children, and to adults performing labor necessary to the food service.”

#### Recommendation

The Sponsor should ensure that meals are served during the approved feeding site time.

### **8. Sponsored centers and homes did not serve a whole grain-rich component once per day as required**

Condition

Based on our review of the menus provided, the Sponsor did not document a whole grain-rich component was served once per day for meals served to participants as follows:

**Unaffiliated Centers:**

***Growing Minds***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/11/20	Supplement	18
3/18/20	Supplement	10

***Kiddie Kingdom***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/30/20	Supplement	15

***Jungle Town***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/3/20	Supplement	63
3/6/20	Supplement	54
3/13/20	Supplement	57
3/20/20	Supplement	28
3/30/20	Supplement	6

**Daycare Home Providers:**

***Aundrea Allen***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/12/20	Supplement	10

***Maggie Brashers***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/2/20	Supplement	4
3/10/20	Breakfast	4
3/12/20	Supplement	4
3/17/20	Breakfast	4
3/25/20	Breakfast	3

***Cybil Dorsey***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/12/20	Supplement	12

***Joy Wells***

<b>Date</b>	<b>Meal Type</b>	<b>No. of Meals</b>
3/2/20	Supplement	1
3/4/20	Supplement	2
3/10/20	Breakfast	2
3/10/20	Lunch	1
3/13/20	Supplement	3
3/16/20	Supplement	3

3/23/20	Lunch	3
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Due to the new the CACFP meal pattern requirements and emphasis on providing technical assistance during the implementation process, there were no meals disallowed.

***This is a repeat finding from a previous report dated July 1, 2019.***

Criteria

*Title 7 of the Code of Federal Regulations, Section 226.20(a)(4)(a)(b)* states “At least one serving per day, across all eating occasions of bread, cereals, and grains, must be whole grain-rich. Whole grain-rich foods contain at least 50 percent whole grains and the remaining grains in the food are enriched, and must meet the whole grain-rich criteria specified in FNS guidance.”

*Title 7 of the Code of Federal Regulations, Section 226.14(b)* states, “In the event that the State agency finds that an institution which prepares its own meals is failing to meet the meal requirements of §226.20, the State agency need not disallow payment or collect an overpayment arising out of such failure if the institution takes such other action as, in the opinion of the State agency, will have a corrective effect.”

Condition

The Sponsor should ensure menus meet the meal patterns established by the USDA.

**9. Sponsored centers and homes purchased and/or served breakfast cereals that did not meet USDA meal component requirements**

Condition

During our monitoring visit on March 10, 2020, we observed a breakfast meal at the home of **Kimberly Hurst**. We observed ten (10) participants were served Very Berry Cheerios, fruit juice, and milk. “Very Berry Cheerios” contains approximately 32 grams of sugar per 100 grams of dry cereal.

During our review of menus provided for **Discovery Learning Academy** for the review period, we noted Honey Nut Cheerios was served for breakfasts on March 13, 2020 and March 23, 2020. Honey Nut Cheerios cereal contains approximately 9 grams of sugar per 28 grams of dry cereal.

Also, during our review of the receipts provided for **The Village** we noted Honey Nut Cheerios had been purchased. Honey Nut Cheerios cereal contains approximately 9 grams of sugar per 28 grams of dry cereal.

Due to the updated CACFP meal pattern requirements and emphasis on providing technical assistance during the implementation process, there were no meals disallowed.

***This is a repeat finding from a previous report dated July 1, 2019.***

Criteria

*Title 7 of the Code of Federal Regulations, Section 226.20(a)(4)(ii)* states, “... Breakfast cereals must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams sucrose

and other sugars per 100 grams of dry cereal) ....”

*Title 7 of the Code of Federal Regulations, Section 226.14(b)* states, “In the event that the State agency finds that an institution which prepares its own meals is failing to meet the meal requirements of §226.20, the State agency need not disallow payment or collect an overpayment arising out of such failure if the institution takes such other action as, in the opinion of the State agency, will have a corrective effect.”

#### Recommendation

The Sponsor should ensure menus meet the meal patterns established by the USDA.

### **10. The Sponsor provided menus that did not name specific type of milk served**

#### Condition

We requested menus and other records to support meals reported as served. The menus provided for **Discovery Learning Academy** and **Jungle Town** did not identify the specific type of milk served to participants for meals with a milk component listed.

There were no meals disallowed as it was observed the correct milk was provided to each age group and receipts were sufficient to identify the type of milk purchased.

***This is a repeat finding from a previous report dated July 1, 2019.***

#### Criteria

*Title 7 of the Code of Federal Regulations, Section 226.17(b)(4)* states, “Each child care center participating in the Program shall claim only the meal types specified in its approved application in accordance with the meal pattern requirements specified in §226.20.... Menus and any other nutritional records required by the State agency shall be maintained to document compliance with such requirements.”

The USDA policy memorandum, CACFP 17-2017 Documenting Meals in the Child and Adult Care Food Program, states, “CACFP centers and day care homes are required to demonstrate that they are serving meals that meet the meal pattern requirements. Centers and day care homes must keep records of menus....”

The USDA policy memorandum, CACFP 17-2016 Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program, states, “In order to ensure compliance with the milk requirements outlined in 7 CFR 226.20(a)(1) and this memorandum, centers and day care homes must document the type of milk served on their menu. This includes listing the fat content (e.g. whole, low-fat or 1%, and fat-free or skim) and if the milk is flavored. It is the responsibility of the State agency or sponsor, as applicable, to further ensure that the correct type of milk is being served when conducting reviews.”

#### Recommendation

The Sponsor should ensure menus reflect and meet the meal patterns established by the USDA.

**Note:** Our observation of the meal services during the review period, revealed no significant

deficiencies at the following centers and homes: **Horn Lake, Presbyterian, Red Rover, Clarice Ross, and Jessica Young.**

Additionally, there were no significant deficiencies noted based on the review of documentation provided for **Brookside and Kinder Academy** and the homes: **Marla Breedlove, Melinda Brown, Brandi Cheatham, Laquita Dandridge, Chasyti Goodwin, Tracy Herman, Carolyn Holloway, Becky Holmes, Kimberly Holmes, Candus Johnson, Chasity Lopez, Alice Perkey, and Karen Williams.**

### Technical Assistance Provided

During the exit conference conducted via Skype on September 24, 2020, the Sponsor requested technical assistance regarding parent or guardian statements and medical statements. Information was sent via email on September 26, 2020.

During our monitoring visits conducted in March 2020, technical assistance was requested and provided by site personnel. Technical assistance was provided on-site as follows:

<b>Date</b>	<b>Center/Home</b>	<b>Technical Assistance Provided</b>
3/2/2020	Barbara Starks	Record keeping requirements
3/5/2020	Aundrea Allen	Updated meal pattern requirements
3/10/2020	Aunty K's	Updated meal pattern requirements; "And Justice for All" poster
3/10/2020	Jayme's Academy #1	Updated meal pattern requirements; "And Justice for All" poster
3/10/2020	Kimberly Hurst	Updated meal pattern requirement; Sugar limits for breakfasts cereals
3/12/2020	Country Home	Record keeping requirements; Meal service operation times
3/12/2020	Presbyterian	Updated meal pattern requirements
3/13/2020	Candus Johnson	Record keeping requirements; Updated meal pattern requirements

### Disallowed Meals Cost

Based on the review, we determined that the Sponsor's noncompliance with the applicable Federal and State regulations that govern the CACFP resulted in a total disallowed cost of \$9,095.45

### Corrective Action

The Sponsor must complete the following actions within 30 days from the date of this report:

- Log into the Tennessee Information Payment System (TIPS) and revise the claim submitted for March 2020, which contains the verified claim data from the enclosed exhibits. ***Please note that, if the claim is revised,*** TIPS will automatically deduct the overpayment from your next CACFP claim for reimbursement. **OR**
- Remit a check payable to the ***Tennessee Department of Human Services*** in the amount noted in the report for recovery of the amounts disallowed in this report. ***Please return the attached billing notice with your check,*** and

- Prepare and submit a corrective action plan to address the deficiencies identified in this report. The corrective action plan template is attached. Please return the corrective action plan to:

[AuditServices.CAPS.DHS@tn.gov](mailto:AuditServices.CAPS.DHS@tn.gov)

If you have questions relative to the corrective action plan, please contact:

Allette Vayda, Director of Operations  
Child and Adult Care Food Program  
James K. Polk Building, 15<sup>th</sup> Floor  
505 Deaderick Street  
Nashville, Tennessee 37243  
[Allette.Vayda@tn.gov](mailto:Allette.Vayda@tn.gov)  
(615) 313-3769

Please note that the amount of disallowed cost is subject to an interest charge. The interest charge will be waived if your revised claim within 30 days from the date of this report. If the revised claim is not completed by the 30-day deadline, an interest charge may be billed to your institution. Please mail your check and the billing notice to:

Child and Adult Care Food Program  
Fiscal Services, 16<sup>th</sup> Floor  
James K. Polk Building  
505 Deaderick Street.  
Nashville, Tennessee 37243

In accordance with the federal regulation found at *7 CFR Part 226.6 (k)*, your institution may appeal the amount of disallowed cost identified in this monitoring report. The procedures for submitting an appeal are enclosed. The appeal must be submitted to:

Tennessee Department of Human Services  
Appeals and Hearings Division, Clerk's Office  
P.O. Box 198996  
Nashville, TN 37219

If the Institution decides to appeal the amount of disallowed administrative and meals cost, all appeal procedures must be followed as failure to do so may result in the denial of your request for an appeal.

We appreciate the assistance provided during this review. If you have any questions regarding this report, please contact Sean Baker, Audit Director 2, at 615-313-4727 or [Sean.Baker@tn.gov](mailto:Sean.Baker@tn.gov).

Sincerely,



Sam O. Alzoubi, CFE  
Director of Audit Services

## Exhibits

cc: Phillip Hester, President, Our Daily Bread, Inc.  
Senta Hester, Executive Director, Our Daily Bread, Inc.  
Sarah Cascaes, Centers Program Manager, Our Daily Bread, Inc.  
Takesha Middleton, Homes Program Manager, Our Daily Bread, Inc.  
Allette Vayda, Director of Operations, Child and Adult Care Food Programs  
Debra Pasta, Program Manager, Child and Adult Care Food Program  
Elke Moore, Administrative Services Assistant 3, Child and Adult Care Food Program  
Constance Moore, Program Specialist, Child and Adult Care Food Program  
Marty Widner, Program Specialist, Child and Adult Care Food Program  
Comptroller of the Treasury, State of Tennessee



**Sponsor of Unaffiliated Centers Program Data (Exhibits B - W)**

**Exhibit A**

**Sponsor: Our Daily Bread of Tennessee, Inc.**

**Review Month/Year: March 2020**

**Total Amount of Reimbursement to Sponsor for Centers: \$571,941.82**

**Amount of CIL included with Reimbursement: \$35,576.79**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Number of Centers	223	223
Total CACFP Food Service Days	22	22
Number of Breakfasts Served	134,238	128,003
Number of Lunches Served	146,612	145,319
Number of Suppers Served	3,185	3,185
Number of Supplements Served	163,672	163,108

**Unaffiliated Centers Program Data (Exhibits B - W)**

**EXHIBIT B**

**Center: Academia Preschool (0349)**

**Reimbursement due based on Reported Information: \$491.95**

**Reimbursement due based on Verified Information: \$418.19**

**Sponsor Reimbursement Paid to Center: \$418.16**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	14	14
Total Attendance	95	95
Percentage of Free or Reduced-price Category	89%	NA <sup>1</sup>
Number of Participants in Free Category	5	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	3	NA <sup>1</sup>
Number of Participants in Paid Category	1	NA <sup>1</sup>
Total Number of Participants	9	NA <sup>1</sup>
Number of Breakfasts Served	91	88
Number of Lunches Served	91	91
Number of Supplements Served	95	0

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT C**

**Center: Aunty K's Child Care (0205)**

**Reimbursement due based on Reported Information: \$1,863.95**

**Reimbursement due based on Verified Information: \$1,584.36**

**Sponsor Reimbursement Paid to Center: \$1,584.36**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	17	17
Total Attendance	632	662 <sup>2</sup>
Percentage of Free or Reduced-price Category	40%	NA <sup>1</sup>
Number of Participants in Free Category	17	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	11	NA <sup>1</sup>
Number of Participants in Paid Category	42	NA <sup>1</sup>
Total Number of Participants	70	NA <sup>1</sup>
Number of Breakfasts Served	632	402
Number of Lunches Served	632	634
Number of Supplements Served	632	632

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>The difference in the reported and verified is immaterial and was not included in this report as a finding

**EXHIBIT D**

**Center: Bearly Tots Enrichment Center Inc. (0017)**

**Reimbursement due based on Reported Information: \$1,463.05**

**Reimbursement due based on Verified Information: \$1,243.59**

**Sponsor Reimbursement Paid to Center: \$1,243.59**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	356	356
Number of Participants in Free Category	15	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	1	NA <sup>1</sup>
Number of Participants in Paid Category	9	NA <sup>1</sup>
Total Number of Participants	25	NA <sup>1</sup>

Number of Breakfasts Served	303	226
Number of Lunches Served	344	344
Number of Supplements Served	351	351

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT E

**Center: Breath of Life Preparatory Preschool (0159)**

**Reimbursement due based on Reported Information: \$2,152.43**

**Reimbursement due based on Verified Information: \$1,829.57**

**Sponsor Reimbursement Paid to Center: \$1,829.57**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	12	12
Total Attendance	902	902
Number of Participants in Free Category	20	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	15	NA <sup>1</sup>
Number of Participants in Paid Category	68	NA <sup>1</sup>
Total Number of Participants	103	NA <sup>1</sup>
Number of Breakfasts Served	740	690
Number of Lunches Served	856	856
Number of Supplements Served	822	822

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT F

**Center: Brookside Learning Center LLC (0024)**

**Reimbursement due based on Reported Information: \$1,065.33**

**Reimbursement due based on Verified Information: \$905.53**

**Sponsor Reimbursement Paid to Center: \$905.53**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	395	395
Percentage of Free or Reduced-price Category	38%	NA <sup>1</sup>
Number of Participants in Free Category	5	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	4	NA <sup>1</sup>

Number of Participants in Paid Category	15	NA <sup>1</sup>
Total Number of Participants	24	NA <sup>1</sup>
Number of Breakfasts Served	357	357
Number of Lunches Served	393	393
Number of Supplements Served	386	386

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT G

**Center: Country Home Day Care (0033)**

**Reimbursement due based on Reported Information: \$9,010.00**

**Reimbursement due based on Verified Information: \$7,658.50**

**Sponsor Reimbursement Paid to Center: \$7,658.50**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	1,509	1,541 <sup>2</sup>
Percentage of Free or Reduced-price Category	99%	NA <sup>1</sup>
Number of Participants in Free Category	74	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	3	NA <sup>1</sup>
Number of Participants in Paid Category	1	NA <sup>1</sup>
Total Number of Participants	78	NA <sup>1</sup>
Number of Breakfasts Served	1,367	431
Number of Lunches Served	1,459	1,459
Number of Supplements Served	1,427	1,372

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>The difference in the reported and verified is immaterial and was not included in this report as a finding

## EXHIBIT H

**Center: Cradles to Crayons (0153)**

**Reimbursement due based on Reported Information: \$1,625.34**

**Reimbursement due based on Verified Information: \$1,381.54**

**Sponsor Reimbursement Paid to Center: \$1,381.54**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22

Total Attendance	433	433
Percentage of Free or Reduced-price Category	52%	NA <sup>1</sup>
Number of Participants in Free Category	10	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	1	NA <sup>1</sup>
Number of Participants in Paid Category	10	NA <sup>1</sup>
Total Number of Participants	21	NA <sup>1</sup>
Number of Breakfasts Served	433	287
Number of Lunches Served	433	430
Number of Supplements Served	433	264

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT I

**Center: Creative Scholars Inc. Academy (0315)**

**Reimbursement due based on Reported Information: \$2,158.38**

**Reimbursement due based on Verified Information: \$1,834.62**

**Sponsor Reimbursement Paid to Center: \$1,834.62**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	8	8
Total Attendance	502	502
Percentage of Free or Reduced-price Category	73%	NA <sup>1</sup>
Number of Participants in Free Category	42	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	5	NA <sup>1</sup>
Number of Participants in Paid Category	17	NA <sup>1</sup>
Total Number of Participants	64	NA <sup>1</sup>
Number of Breakfasts Served	498	17 <sup>2</sup>
Number of Lunches Served	402	399
Number of Supplements Served	502	502

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>We noted 497 breakfasts served; the difference in the reported and verified is immaterial and was not included in this report as a finding

**EXHIBIT J****Center: Crossroads Academy (0335)****Reimbursement due based on Reported Information: \$1,818.51****Reimbursement due based on Verified Information: \$1,545.73****Sponsor Reimbursement Paid to Center: \$1,545.73**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	1,285	1,285
Number of Participants in Free Category	3	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	9	NA <sup>1</sup>
Number of Participants in Paid Category	80	NA <sup>1</sup>
Total Number of Participants	92	NA <sup>1</sup>
Number of Breakfasts Served	986	882
Number of Lunches Served	1,266	1,267
Number of Supplements Served	1,256	1,256

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT K****Center: Growing Minds Learning House (0320)****Reimbursement due based on Reported Information: \$1,407.14****Reimbursement due based on Verified Information: \$4,164.95****Sponsor Reimbursement Paid to Center: \$4,164.94**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	359	372 <sup>2</sup>
Percentage of Free or Reduced-price Category	61%	NA <sup>1</sup>
Number of Participants in Free Category	9	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	5	NA <sup>1</sup>
Number of Participants in Paid Category	9	NA <sup>1</sup>
Total Number of Participants	23	NA <sup>1</sup>
Number of Breakfasts Served	343	331
Number of Lunches Served	354	354
Number of Supplements Served	353	353

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>The difference in the reported and verified is immaterial and was not included in this report as a finding

**EXHIBIT L**

**Center: Horn Lake Road Day Care Center Inc. (0151)**

**Reimbursement due based on Reported Information: \$6,180.87**

**Reimbursement due based on Verified Information: \$5,253.74**

**Sponsor Reimbursement Paid to Center: \$5,253.74**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	1,205	1,205
Percentage of Free or Reduced-price Category	90.4%	NA <sup>1</sup>
Number of Participants in Free Category	91	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	12	NA <sup>1</sup>
Number of Participants in Paid Category	11	NA <sup>1</sup>
Total Number of Participants	114	NA <sup>1</sup>
Number of Breakfasts Served	1,041	913
Number of Lunches Served	1,054	1,054
Number of Supplements Served	1,205	1,205

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT M**

**Center: Jaymes Academy #1 (0139)**

**Reimbursement due based on Reported Information: \$2,905.57**

**Reimbursement due based on Verified Information: \$2,469.73**

**Sponsor Reimbursement Paid to Center: \$2,469.73**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	1,155	1,155
Percentage of Free or Reduced-price Category	32%	NA <sup>1</sup>
Number of Participants in Free Category	14	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	10	NA <sup>1</sup>
Number of Participants in Paid Category	50	NA <sup>1</sup>

Total Number of Participants	74	204
Number of Breakfasts Served	1,094	1,080
Number of Lunches Served	1,152	1,152
Number of Supplements Served	1,155	1,155

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT N**

**Center: Jungle Town Daycare & Early Learning Center (0226)**  
**Reimbursement due based on Reported Information: \$1,583.18**  
**Reimbursement due based on Verified Information: \$1,345.70**  
**Sponsor Reimbursement Paid to Center: \$1,345.70**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	933	963 <sup>2</sup>
Number of Participants in Free Category	7	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	7	NA <sup>1</sup>
Number of Participants in Paid Category	66	NA <sup>1</sup>
Total Number of Participants	80	NA <sup>1</sup>
Number of Breakfasts Served	819	680
Number of Lunches Served	916	917
Number of Supplements Served	847	807

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>The difference in the reported and verified is immaterial and was not included in this report as a finding

**EXHIBIT O**

**Center: Kiddie Kingdom (0053)**  
**Reimbursement due based on Reported Information: \$1,618.48**  
**Reimbursement due based on Verified Information: \$1,375.71**  
**Sponsor Reimbursement Paid to Center: \$1,375.71**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	336	336
Percentage of Free or Reduced-price Category	82%	NA <sup>1</sup>



Number of Participants in Free Category	14	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	4	NA <sup>1</sup>
Number of Participants in Paid Category	4	NA <sup>1</sup>
Total Number of Participants	22	NA <sup>1</sup>
Number of Breakfasts Served	296	296
Number of Lunches Served	313	313
Number of Supplements Served	336	336

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT P

**Center: Kinder Academy Learning Center II, LLC (0229)**

**Reimbursement due based on Reported Information: \$1,506.90**

**Reimbursement due based on Verified Information: \$1,280.87**

**Sponsor Reimbursement Paid to Center: \$1,280.87**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	342	342
Percentage of Free or Reduced-price Category	65%	NA <sup>1</sup>
Number of Participants in Free Category	15	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	0	NA <sup>1</sup>
Number of Participants in Paid Category	8	NA <sup>1</sup>
Total Number of Participants	23	NA <sup>1</sup>
Number of Breakfasts Served	322	322
Number of Lunches Served	340	340
Number of Supplements Served	334	334

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT Q****Center: Lily Pad Learning Center II (0230)****Reimbursement due based on Reported Information: \$757.18****Reimbursement due based on Verified Information: \$643.60****Sponsor Reimbursement Paid to Center: \$643.60**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	20	20
Total Attendance	164	164
Percentage of Free or Reduced-price Category	69%	NA <sup>1</sup>
Number of Participants in Free Category	11	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	0	NA <sup>1</sup>
Number of Participants in Paid Category	5	NA <sup>1</sup>
Total Number of Participants	16	NA <sup>1</sup>
Number of Breakfasts Served	162	85
Number of Lunches Served	161	161 <sup>2</sup>
Number of Supplements Served	161	155

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>We noted 160 lunches served; the difference in the reported and verified is immaterial and was not included in this report as a finding

<sup>3</sup>Receipts provided were not legible and food costs were unable to be reconciled

**EXHIBIT R****Center: Little Tikes (0313)****Reimbursement due based on Reported Information: \$2,957.73****Reimbursement due based on Verified Information: \$2,514.07****Sponsor Reimbursement Paid to Center: \$2,514.07**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	15	15
Total Attendance	981	981
Percentage of Free or Reduced-price Category	53%	NA <sup>1</sup>
Number of Participants in Free Category	28	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	13	NA <sup>1</sup>
Number of Participants in Paid Category	37	NA <sup>1</sup>
Total Number of Participants	78	NA <sup>1</sup>

Number of Breakfasts Served	761	66
Number of Lunches Served	821	821
Number of Supplements Served	921	921

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT S

**Center: Littlebug's Learning Leaf (0083)**

**Reimbursement due based on Reported Information: \$3,183.05**

**Reimbursement due based on Verified Information: \$2,705.59**

**Sponsor Reimbursement Paid to Center: \$2,705.59**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	1,694	1,694
Percentage of Free or Reduced-price Category	31%	NA <sup>1</sup>
Number of Participants in Free Category	17	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	18	NA <sup>1</sup>
Number of Participants in Paid Category	78	NA <sup>1</sup>
Total Number of Participants	113	NA <sup>1</sup>
Number of Breakfasts Served	1,066	103
Number of Lunches Served	1,343	748
Number of Supplements Served	1,688	1,688

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

## EXHIBIT T

**Center: Meg Meg's Learn and Play Center, LLC (0345)**

**Reimbursement due based on Reported Information: \$4,165.19**

**Reimbursement due based on Verified Information: \$3,540.41**

**Sponsor Reimbursement Paid to Center: \$3,540.41**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	22	22
Total Attendance	844	844
Percentage of Free or Reduced-price Category	88%	NA <sup>1</sup>
Number of Participants in Free Category	22	NA <sup>1</sup>

Number of Participants in Reduced-Price Category	16	NA <sup>1</sup>
Number of Participants in Paid Category	5	NA <sup>1</sup>
Total Number of Participants	43	NA <sup>1</sup>
Number of Breakfasts Served	758	0
Number of Lunches Served	791	582
Number of Supplements Served	769	769

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT U**

**Center: Presbyterian Day School (0101)**

**Reimbursement due based on Reported Information: \$1,096.32**

**Reimbursement due based on Verified Information: \$931.87**

**Sponsor Reimbursement Paid to Center: \$931.87**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	874	874
Number of Participants in Free Category	4	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	0	NA <sup>1</sup>
Number of Participants in Paid Category	67	NA <sup>1</sup>
Total Number of Participants	71	NA <sup>1</sup>
Number of Breakfasts Served	873	330
Number of Lunches Served	874	874
Number of Supplements Served	874	874

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**EXHIBIT V**

**Center: Red Rover Preschool (0103)**

**Reimbursement due based on Reported Information: \$1,041.46**

**Reimbursement due based on Verified Information: \$885.24**

**Sponsor Reimbursement Paid to Center: \$885.24**

<b>Program Area</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total CACFP Food Service Days	22	22
Total Attendance	495	518 <sup>2</sup>

Percentage of Free or Reduced-price Category	26%	NA <sup>1</sup>
Number of Participants in Free Category	1	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	5	NA <sup>1</sup>
Number of Participants in Paid Category	17	NA <sup>1</sup>
Total Number of Participants	23	NA <sup>1</sup>
Number of Breakfasts Served	489	0
Number of Lunches Served	495	107
Number of Supplements Served	491	292

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

<sup>2</sup>The difference in the reported and verified is immaterial and was not included in this report as a finding

## EXHIBIT W

**Center: The Village Learning Academy (0297)**

**Reimbursement due based on Reported Information: \$1,163.51**

**Reimbursement due based on Verified Information: \$988.98**

**Sponsor Reimbursement Paid to Center: \$988.98**

Program Area	Reported on Claim	Reconciled to Documentation
Total CACFP Food Service Days	15	15
Total Attendance	528	528
Percentage of Free or Reduced-price Category	39%	NA <sup>1</sup>
Number of Participants in Free Category	9	NA <sup>1</sup>
Number of Participants in Reduced-Price Category	4	NA <sup>1</sup>
Number of Participants in Paid Category	33	NA <sup>1</sup>
Total Number of Participants	46	NA <sup>1</sup>
Number of Breakfasts Served	406	16
Number of Lunches Served	523	429
Number of Supplements Served	519	519

<sup>1</sup>The number of participants and their classifications were not verified due to the limited review because of COVID-19

**Sponsor of Day Care Homes Program Data**

**Exhibit X**

**Sponsor: Our Daily Bread of Tennessee, Inc.**

**Review Month/Year: March 2020**

**Total Amount Paid to Sponsor for Reported Meals: \$160,125.97**

**Total Amount Paid by Sponsor to Homes for Meals: \$141,931.97**

**Total Sponsor Admin Paid: \$18,194.00**

**Total Sponsor Admin Due Based on Number of Homes: \$18,194.00**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Total Number of Tier 1 Homes	177	177
Total Number of Tier 2 Homes	7	7
Total Number of Homes	184	184
Number of Tier 1 Breakfasts Served	26,078	26,092
Number of Tier 2 Breakfasts Served	609	609
Number of Tier 1 Lunches Served	25,155	25,155
Number of Tier 2 Lunches	681	681
Number of Tier 1 Suppers Served	7,526	7,526
Number of Tier 2 Suppers Served	0	0
Number of Tier 1 Supplements Served	32,998	33,082
Number of Tier 2 Supplements Served	701	701

**Tier I Day Care Homes Program Data (Exhibits Y - AT)**

**Exhibit Y**

**Name of Home: Allen, Aundrea (0037)**

**Reimbursement due based on Reported Information: \$975.84**

**Sponsor Reimbursement Paid to the Home: \$975.84**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	214	214
Number of Lunches Served	214	214
Number of Supplements Served	214	214

**Exhibit Z****Name of Home: Brashers, Maggie (0257)****Reimbursement due based on Reported Information: \$358.15****Sponsor Reimbursement Paid to the Home: \$358.15**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	20	20
Number of Breakfasts Served	75	75
Number of Lunches Served	80	80
Number of Supplements Served	80	80

**Exhibit AA****Name of Home: Breedlove, Marla****Reimbursement due based on Reported Information: \$524.14****Sponsor Reimbursement Paid to the Home: \$524.14**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	21	21
Number of Breakfasts Served	106	106
Number of Lunches Served	120	120
Number of Supplements Served	114	114

**Exhibit AB****Name of Home: Brown, Melinda****Reimbursement due based on Reported Information: \$145.92****Sponsor Reimbursement Paid to the Home: \$145.92**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	12	12
Number of Breakfasts Served	32	32
Number of Lunches Served	32	32
Number of Supplements Served	32	32

**Exhibit AC****Name of Home: Cheatham, Brandi****Reimbursement due based on Reported Information: \$1,255.58****Sponsor Reimbursement Paid to the Home: \$1,255.58**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
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Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	264	264
Number of Lunches Served	272	272
Number of Supplements Served	307	307

**Exhibit AD**

**Name of Home: Dandridge, Laquita**

**Reimbursement due based on Reported Information: \$401.28**

**Sponsor Reimbursement Paid to the Home: \$401.28**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	88	88
Number of Lunches Served	88	88
Number of Supplements Served	88	88

**Exhibit AE**

**Name of Home: Dorsey, Cybil (0116)**

**Reimbursement due based on Reported Information: \$628.83**

**Sponsor Reimbursement Paid to the Home: \$628.83**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	14	14
Number of Breakfasts Served	162	162
Number of Lunches Served	125	125
Number of Supplements Served	138	138

**Exhibit AF**

**Name of Home: Glenn, Timolin**

**Reimbursement due based on Reported Information: \$197.98**

**Sponsor Reimbursement Paid to the Home: \$197.98**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	42	42
Number of Lunches Served	44	44
Number of Supplements Served	44	44



**Exhibit AG****Name of Home: Goodwin, Chasyti****Reimbursement due based on Reported Information: \$2,089.99****Sponsor Reimbursement Paid to the Home: \$2,089.99**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	20	20
Number of Breakfasts Served	334	334
Number of Lunches Served	246	246
Number of Supplements Served	444	444
Number of Suppers Served	283	283

**Exhibit AH****Name of Home: Herman, Tracy****Reimbursement due based on Reported Information: \$1,184.27****Sponsor Reimbursement Paid to the Home: \$1,184.27**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	259	259
Number of Lunches Served	260	260
Number of Supplements Served	260	260

**Exhibit AI****Name of Home: Holloway, Carolyn (0143)****Reimbursement due based on Reported Information: \$1,668.36****Sponsor Reimbursement Paid to the Home: \$1,668.36**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	220	220
Number of Lunches Served	220	220
Number of Supplements Served	493	493
Number of Suppers Served	186	186

**Exhibit AJ****Name of Home: Holmes, Becky****Reimbursement due based on Reported Information: \$401.28****Sponsor Reimbursement Paid to the Home: \$401.28**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	88	88
Number of Lunches Served	88	88
Number of Supplements Served	88	88

**Exhibit AK****Name of Home: Holmes, Kimberly (0443)****Reimbursement due based on Reported Information: \$300.96****Sponsor Reimbursement Paid to the Home: \$300.96**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	66	66
Number of Lunches Served	66	66
Number of Supplements Served	66	66

**Exhibit AL****Name of Home: Hurst, Kimberly****Reimbursement due based on Reported Information: \$888.17****Sponsor Reimbursement Paid to the Home: \$888.17**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	192	192
Number of Lunches Served	195	195
Number of Supplements Served	199	199

**Exhibit AM****Name of Home: Johnson, Candus****Reimbursement due based on Reported Information: \$1,446.71****Sponsor Reimbursement Paid to the Home: \$1,446.71**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
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Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	104	104
Number of Lunches Served	260	260
Number of Supplements Served	264	264
Number of Suppers Served	187	187

**Exhibit AN**

**Name of Home: Lopez, Chasity**

**Reimbursement due based on Reported Information: \$328.32**

**Sponsor Reimbursement Paid to the Home: \$328.32**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	72	72
Number of Lunches Served	72	72
Number of Supplements Served	72	72

**Exhibit AO**

**Name of Home: Perkey, Alice**

**Reimbursement due based on Reported Information: \$1,325.14**

**Sponsor Reimbursement Paid to the Home: \$1,325.14**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	291	291
Number of Lunches Served	287	287
Number of Supplements Served	302	302

**Exhibit AP**

**Name of Home: Ross, Clarice**

**Reimbursement due based on Reported Information: \$346.95**

**Sponsor Reimbursement Paid to the Home: \$346.95**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	81	81
Number of Lunches Served	72	72

Number of Supplements Served	81	81
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**Exhibit AQ**

**Name of Home: Starks, Barbara**

**Reimbursement due based on Reported Information: \$1,980.99**

**Sponsor Reimbursement Paid to the Home: \$1,981.09**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	20	22 <sup>1</sup>
Number of Breakfasts Served	312	326
Number of Lunches Served	361	361
Number of Supplements Served	417	501
Number of Suppers Served	144	144

<sup>1</sup>The difference in the reported and verified is immaterial and was not included in this report as a finding

**Exhibit AR**

**Name of Home: Wells, Joy (0207)**

**Reimbursement due based on Reported Information: \$482.48**

**Sponsor Reimbursement Paid to the Home: \$482.48**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	18	18
Number of Lunches Served	70	70
Number of Supplements Served	88	88
Number of Suppers Served	88	88

**Exhibit AS**

**Name of Home: Williams, Karen**

**Reimbursement due based on Reported Information: \$654.30**

**Sponsor Reimbursement Paid to the Home: \$654.30**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	143	143
Number of Lunches Served	143	143
Number of Supplements Served	146	146

**Exhibit AT**

**Name of Home: Young, Jessica**

**Reimbursement due based on Reported Information: \$693.12**

**Sponsor Reimbursement Paid to the Home: \$693.12**

<b>Home Meal Service Reconciliation and Monitor Activity</b>	<b>Reported on Claim</b>	<b>Reconciled to Documentation</b>
Total Days of CACFP Food Service	22	22
Number of Breakfasts Served	152	152
Number of Lunches Served	152	152
Number of Supplements Served	152	152



**STATE OF TENNESSEE  
DEPARTMENT OF HUMAN SERVICES**

JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1403

TELEPHONE: 615-313-4700 FAX: 615-741-4165  
TTY: 1-800-270-1349  
[www.tn.gov/humanservices](http://www.tn.gov/humanservices)

**BILL LEE**  
GOVERNOR

**DANIELLE W. BARNES**  
COMMISSIONER

**Billing Notice**

November 18, 2020

Johnny Cannon, Chairman of the Board  
Our Daily Bread of Tennessee, Incorporated  
900 East Hill Avenue  
Knoxville, Tennessee 37915-2563

This billing notice is based on the disallowed meals cost noted in the monitoring report of the Child and Adult Care Food Program (CACFP) due to noncompliance with the applicable Federal and State regulations that govern the CACFP.

Amount Due: \$9,095.45  
Due Date: December 21, 2020  
Date of the Monitoring Report: November 18, 2020  
Agreement/Contract Number: 00-059

**Note1:** Please remit a check payable to the Tennessee Department of Human Services in the disallowed amount noted in the monitoring report by the due date to the address below:

Tennessee Department of Human Services  
Fiscal Services 16<sup>th</sup> Floor  
James K. Polk Building  
505 Deaderick Street  
Nashville, Tennessee 37243

**Note 2:** Please log into the Tennessee Information Payment System (TIPS) and revise the claim for reimbursement that was submitted for March 2020. Use the reconciled claim data of the exhibits enclosed in the monitoring report.

Please note that the disallowed cost of the CACFP is subject to an interest charge. The interest charge will be waived if the payment is received by the due date. If payment is not received by the end of 5<sup>th</sup> day of the due date, an interest charge may be added to the original amount due and will be billed to your entity.

If you have any questions regarding this notice, please feel free to contact Allette Vayda, Director of Operations at (615) 313-3769 or [Allette.Vayda@tn.gov](mailto:Allette.Vayda@tn.gov).

Thank you for your attention